

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

MARK WILLIAMS, as Personal Representative  
of the Estate of Shane P. Williams, and MARK  
WILLIAMS, a married man as his separate  
property,

Plaintiff,

-vs-

KITSAP COUNTY, a municipal corporation;  
BEN HERRIN and JANE DOE HERRIN,  
husband and wife, and the marital community  
comprised thereof; and PAUL WOODRUM and  
JANE DOE WOODRUM, husband and wife, and  
the marital community comprised thereof,

Defendants.

NO. 08-CV-05430-RBL

STIPULATION AND PROTECTIVE  
ORDER RE: LAW ENFORCEMENT  
WITNESSES AND PARTIES

**STIPULATION**

COME NOW, the parties hereto, through their respective counsel, and stipulate as follows:

1. All personal information acquired through the course of discovery regarding employees of the Kitsap County Sheriff's Office and/or other law enforcement officers shall be deemed confidential.

2. In addition to its ordinary meaning, for the purposes of this stipulation, "personal information" shall be deemed to include any/all information, in whatever format it is contained, that

1 references the individual's:

2 a) date of birth;

3 b) educational history;

4 c) medical and/or mental health information or history;

5 d) employment history (including, but not limited to internal investigations, reprimand or  
6 discipline; provided, however, that the Kitsap County and/or Kitsap County Sheriff's Office's internal  
7 investigation of the incident that is the subject matter of this lawsuit and any disciplinary action resulting  
8 therefrom (including without limitations the investigation by and proceedings before the Kitsap County  
9 Sheriff's Office of Professional Standards) shall not be "personal information" and shall not be deemed  
10 confidential, pursuant to the terms of this agreement.)

11 e) place of personal residence, past or present; and/or

12 f) identification of family members.

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14  
15 3. Information deemed confidential by the terms of this Stipulation and Order shall be used for  
16 the purposes of this action only, and shall not be disseminated outside of the confines of this case, nor shall  
17 it be included in any pleading, record or document which is not filed under seal with the court or redacted in  
18 accordance with applicable law. Filings of confidential information shall comply with Fed. R. Civ. P. Local  
19 Rule 5(g).  
20

21  
22 Confidential information shall not be disclosed to any person or entity other than to this court,  
23 under seal, as described above; the parties to this action; counsel for the parties in this action who have  
24 executed this Stipulation and Protection Order, their employees, or others retained by counsel to assist in  
25 the preparation or presentation of this case. All such persons to whom secondary dissemination is made by  
26 counsel of record shall be bound by the terms of this agreement.  
27  
28

1           4. Any party may challenge the designation and/or identification of any document or  
2 information as "Confidential" by motion filed with the Court.

3  
4           5. This Stipulation and Protective Order shall not be deemed as a limitation of either parties' ability  
5 to seek the sealing or protection of any record, in accordance with Fed. R. Civ. P. Local Rule 5(g).

6           6. This Stipulation and Protective Order shall be binding throughout and after final adjudication  
7 and/or other resolution of this matter.

8           DATED this 6th day of October, 2008.

9  
10                               RUSSELL D. HAUGE  
11                               Kitsap County Prosecuting Attorney

12                               /s/  
13                               \_\_\_\_\_  
14                               IONE S. GEORGE, WSBA #18236  
15                               Senior Deputy Prosecuting Attorney  
16                               Attorney for Defendants

17           DATED this 6th day of October, 2006.

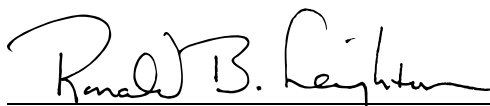
18                               BECKETT LAW OFFICES, PLLC

19                               /s/  
20                               \_\_\_\_\_  
21                               GUY W. BECKETT, WSBA #14939  
22                               Attorney for Plaintiff

23                               **ORDER**

24           Pursuant to the foregoing Stipulation, it is hereby,  
25           ORDERED that all parties to the above Stipulation shall abide by the terms and conditions set forth  
26           thereby.

27           DONE IN OPEN COURT this 20<sup>th</sup> day of October, 2008

28                                 
                              RONALD B. LEIGHTON  
                              UNITED STATES DISTRICT JUDGE

1  
2 PRESENTED BY:

3 RUSSELL D. HAUGE  
4 Kitsap County Prosecuting Attorney

5 /s/

6 IONE S. GEORGE, WSBA #18236  
7 Senior Deputy Prosecuting Attorney  
8 Attorney for Defendants

9 APPROVED FOR ENTRY; NOTICE OF  
10 PRESENTATION WAIVED:

11 BECKETT LAW OFFICES, PLLC

12 /s/

13 GUY W. BECKETT, WSBA #14939  
14 Attorney for Plaintiffs